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October 28, 2002

VIA FEDERAL EXPRESS

Jeff S. Jordan
Supervisory Attorney
General Counsel's Office
Federal Election Commission
999 "E" Street, NW
Washington, D.C. 20463

Re: *MUR 5304*

Dear Mr. Jordan:

We represent Vince Hall for Assembly (the "Committee") and Mary Ellen Padilla, the treasurer of the Committee. We write in response to the charges made by the National Republican Congressional Committee against the Committee and Ms. Padilla.

The National Republican Congressional Committee makes the outrageous and unsupported claim that because Vince Hall for Assembly and Friends of Dennis Cardoza supported each other, they must have colluded to launder money for Mr. Cardoza's congressional campaign. There is no evidence to support that argument, and the Republican Congressional Committee provides none.

The simple truth is that Vince Hall and Dennis Cardoza are friends and supporters of each other. Mr. Hall grew up in the Central Valley of California, where Mr. Cardoza is running for Congress, and he has strong ties to the Democratic Party and its candidates in the region. Mr. Hall has previously contributed to candidates in the Central Valley and the Vince Hall for Assembly Committee contribution at issue here is in keeping with that policy. Further, Mr. Hall and Mr. Cardoza worked together and became friends when Mr. Cardoza was in the State Assembly and Mr. Hall was Staff Director for Governor Gray Davis. Given these facts, it is perfectly appropriate and understandable that Mr. Cardoza and Mr. Hall would want to support each other.

Most important, there was no agreement, express or implied, that Vince Hall for Assembly would contribute to Cardoza for Congress in return for a contribution from Friends of

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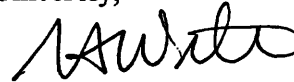
Jeff S. Jordan
October 28, 2002
Page 2

Dennis Cardoza. The Committee made a decision to contribute to Mr. Cardoza's congressional effort before, and independent of, Friends of Dennis Cardoza's contribution to the Committee. To be clear, there was no connection between the Committee's contribution to Cardoza for Assembly and its receipt of a contribution from Friends of Dennis Cardoza. That friends and colleagues support each other is not evidence of money laundering.

Further, the timing and amount of the contributions do not support the Republican Committee's allegation. As a supporter of Mr. Cardoza, Mr. Hall's campaign committee contributed \$1,000 to Mr. Cardoza's Committee on January 31, 2002. At the time the contribution was made, the Committee had not received any contributions from Friends of Dennis Cardoza. This, of course, does not fit the pattern of alleged "money-laundering" described by the complainant whereby "[t]he state and local campaigns who received the Cardoza non-federal money returned the favor by donating generous sums to Cardoza's federal campaign account . . ." The Committee made a contribution to Cardoza for Congress *before* Friends of Dennis Cardoza contributed to Vince Hall for Assembly. In addition, there is no relationship between the amount of the Committee's contribution (\$1,000) and the amount of the Friends of Dennis Cardoza's contribution (\$3,000).

The National Republican Congressional Committee has produced no evidence of money laundering, nor could it. The complaint fails to state a claim and should be dismissed.

Sincerely,



Thomas A. Willis

TAW:NL